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14  
15 **UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

16 CHARLOTTE BOWNES; JOSEPH  
17 LAGRECA; JESSICA NAUMANN; and  
CHRISTOPHER GOODIN, individually and  
18 on behalf of all others similar situated,

19 Plaintiffs,

20 v.

21 INTERNATIONAL GAME TECHNOLOGY  
22 PLC; MGM RESORTS INTERNATIONAL;  
23 BALLY'S CORPORATION; PENN  
ENTERTAINMENT, INC.; STATION  
CASINOS, LLC,

24 Defendants.

Case No.: 3:24-cv-00528-ART-CSD

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
DEFENDANTS TO RESPOND TO  
COMPLAINT [ECF NO. 1]**

**(FIRST REQUEST)**

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Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and Christopher Goodin, on one hand, and Defendant International Game Technology, PLC<sup>1</sup>, on the other hand, by and through their respective undersigned attorneys of record (collectively, the “Parties”), hereby stipulate and agree subject to the Court’s approval to extend time for defendants to respond to the Complaint (ECF No. 1). The current deadline for Defendant International Game Technology, PLC is December 16, 2024. This is the first request for extension concerning this deadline.

1. On November 21, 2024, Plaintiffs filed their Complaint (ECF No. 1) against defendants, including Defendant International Game Technology, PLC (Defendant).
2. On November 25, 2024, Plaintiffs mailed a copy of the Complaint and Summons to a registered agent associated with Defendant (ECF No. 11).
3. The current deadline for Defendant to respond to the Complaint (ECF No. 1) is December 16, 2024.
4. Defendant contacted Plaintiffs to discuss its position that International Game Technology, PLC is an improperly named party. Defendant also indicated that other defendants share a similar concern.
5. Through this conferral process, Plaintiffs stated that they intend to amend the complaint to add additional parties and defendants.
6. Subject to the Court’s approval, the Parties have agreed that all defendants shall have an additional forty-five (45) days to respond to the Complaint (ECF No. 1).
7. During the requested extension, the parties intend to confer regarding the named defendants and anticipate the filing of an amended complaint. The Parties will confer regarding the filing of any amended complaint and a proposed briefing schedule.
8. Good cause exists to grant this stipulation and it is submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

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<sup>1</sup>By entering into this stipulation, Defendant International Game Technology PLC does not waive any arguments related to service of process, jurisdiction or any initial motion defenses.

DATED: December 16, 2024

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DATED: December 16, 2024

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**IT IS SO ORDERED.**

**UNITED STATES DISTRICT JUDGE /  
UNITED STATES MAGISTRATE JUDGE  
Dated:**